

From: [Sandra Hamilton](#)
To: [Mike Murray](#)
Cc: [Doug Wetmore](#)
Subject: Re: CWB DFCs
Date: 10/11/2010 09:24 AM
Attachments: [CWB DFCs.rev100710.mbm.docx](#)

Hi Mike,

Here's SELC concern and the redrafted response. Does this do it? If you have a more detailed explanation of why NPS chose to use the historical data as it did for establishing the targets, it'd be good to add it to the highlighted area(s) of the response. I've changed the response as below in the 2nd internal draft FEIS Appendix C comment response report and will make any further changes you think appropriate. Thanks.

We are particularly concerned about the failure of the NPS to include North Carolina Wildlife Resources Commission data in determining the targets. The DEIS states that the "targets did not take into account data from any surveys conducted prior to 2007 due to the uncertainty associated with survey methods, survey timing, data management, and data compiled for each survey year." DEIS at 10. However, in the State Listed and Special Status Species section of the DEIS, Table 30 at 241, the NPS does list the colonial waterbird data from surveys prior to 2007. If the data are reliable enough to use in the section that discusses the status of species, they also are reliable enough to be used to set targets. The data are used to determine the status of waterbird populations in North Carolina (including consideration of endangered, threatened, and special concern status), regional waterbird populations in the southeastern United States and national waterbird populations. We also note the early colonial waterbird surveys were conducted by Dr. James Parnell, who is now an emeritus professor from the University of North Carolina at Wilmington, and a nationally noted expert on colonial waterbirds. The colonial waterbird surveys were conducted by personnel who are experienced with detecting and counting colonial waterbird nests, and certainly such data are better than having no data at all for the entire period. As the DEIS notes in discussing the colonial waterbird data, "[a]lthough different survey protocols have been used at the Seashore between 1977 and 2009, recent estimates of colonial waterbird nests at the Seashore are clearly much lower than they were 30 years ago (see table 30). DEIS at 240. Using data from 2007 and later allows the NPS to mask the very large decline in colonial waterbird numbers that has occurred at the Seashore. Furthermore, it uses data from the time at which waterbird populations were the lowest ever recorded on the Seashore.

Response: redrafted 101110 sh

NPS has considered the additional information provided by commenter about the pre-2007 colonial waterbird surveys and agrees that it is reasonable to consider this data **for the purpose of setting targets**. NPS has re-examined the historic data set for colonial nesting waterbirds and revised targets in the DEIS (Table 5, p.10) in the FEIS (CH 1, Desired Future Conditions for Threatened, Endangered, State-listed, and Special Status Species, Table 5) to take into account higher historic numbers of nests at the Seashore **as a factor in the determination** of desired future conditions for colonial waterbirds as follows:

Desired Future Conditions for Colonial Waterbirds at Cape Hatteras National Seashore

Variable	Short-	Long-	Source
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	term ^a target	term ^b target	
Annual peak number of least tern nests	5-year average of 462 nests	5-year average of 577 nests	Long-term target equals 2009 peak count. Short-term target is mid-point between recent average (2007-2010) and the long-term target.
Annual peak number of common tern nests	5-year average of 292 nests	5-year average of 533 nests	Long-term target equals the average number of nests that occurred in 1977-2004. Short-term target is the mid-point between recent average (2007-2010) and the long-term target.
Annual peak number of gull-billed tern nests	5-year average of 21 nests	5-year average of 40 nests	Long-term target equals the average number of nests that occurred in 1977-2004. Short-term target is the mid-point between recent average (2007-2010) and the long-term target.
Annual peak number of black skimmer nests	5-year average of 132 nests	5-year average of 244 nests	Long-term target equals the average number of nests that occurred in 1977-2004. Short-term target is the mid-point between recent average (2007-2010) and the long-term target.

^a Short-term target is to achieve the midway point between the long-term target and the average of the data points from the Seashore's 2007 - 2010 counts.

^b Except for least terns, the long-term target is to achieve the 1977 - 2004 level of nesting at the Seashore. Least terns are currently nesting in greater numbers than the 1977-2004 average; therefore, the long-term target is to maintain a 5-year average count equal to the 2009 peak count.

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**Mike
Murray/CAHA/NPS**

To Sandra Hamilton/DENVER/NPS@NPS

cc Doug Wetmore/DENVER/NPS@NPS

10/11/2010 06:54 AM

Subject CWB DFCs

Sandy,

Would you please have someone review the comment response to the SELC et al's comment about the DEIS's CWB DFC being too low since it was based on historically low nest counts for 2007-2008. With our latest revision to the CWB DFCs, the response may need to be revised too. I don't recall if our comment response simply said it was being revised... or if our response said specifically it was being revised

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(based on the methodology that Tim Pinion had proposed in June 2010) so that the long-term target is to achieve 1977 – 1983 level of nesting at CAHA (i.e., average of 1977 and 1983 nest counts).

If the previously drafted response is a general statement that the DFC has been revised based on longer-term data, then the response may be okay as written; BUT if the response indicates the specific methodology (that Tim Pinion had proposed), then the response may need to be revised to reflect the new revised methodology

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----- Forwarded by Mike Murray/CAHA/NPS on 10/11/2010 08:39 AM -----

**Mike
Murray/CAHA/NPS**

To Sandra Hamilton/DENVER/NPS@NPS

cc Doug Wetmore/DENVER/NPS@NPS

10/07/2010 04:18 PM

Subject Chapter 1 comments

Sandy,

Our attached comments/edits of Chapter 1 include the revised DFCs for CWB. Other than the changes for CWB DFCs, we have very few comments. Also, attached is a revised calculation sheet (since yesterday) to fully explain the short-term target number for LETE.

[attachment "01_Chapter-1_2nd_Draft_FEIS_093010[1].mbm.doc" deleted by Mike



Murray/CAHA/NPS]

CWB DFCs.rev100710 mbm.docx

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TABLE 5. DESIRED FUTURE CONDITIONS FOR COLONIAL WATERBIRDS

Variable	Short-Term Target ^a	Long-Term Target ^b	Source
Annual peak number of least tern nests	5-year average of 462 nests	5-year average of 577 nests	Long-term target equals 2009 peak count. Short-term target is mid-point between recent average (2007-2010) and the long-term target.
Annual peak number of common tern nests	5-year average of 292 nests	5-year average of 533 nests	Long-term target equals the average number of nests that occurred in 1977-2004. Short-term target is the mid-point between recent average (2007-2010) and the long-term target.
Annual peak number of gull-billed tern nests	5-year average of 21 nests	5-year average of 40 nests	Long-term target equals the average number of nests that occurred in 1977-2004. Short-term target is the mid-point between recent average (2007-2010) and the long-term target.
Annual peak number of black skimmer nests	5-year average of 132 nests	5-year average of 244 nests	Long-term target equals the average number of nests that occurred in 1977-2004. Short-term target is the mid-point between recent average (2007-2010) and the long-term target.

^aShort-term target is to achieve the midway point between the long-term target and the recent average of the data points from the Seashore's 2007 - 2010 counts.

^bExcept for least terns, the long-term target for the respective species is to achieve the average number of nests that occurred at the Seashore in 1977 - 2004. Least terns are currently nesting in greater numbers than the 1977-2004 average; therefore, the long-term target is to maintain a 5-year average count equal to the 2009 peak count.

Calculations

- A. Long-term target = 1977 - 2004 "long-term average", except for LETE, which is 2009 peak nest count of 577
 B. "Recent average" for 2007 - 2010
 C. Short-term target = $\frac{1}{2}(A - B) + B$

Species	Long-term target (A)	Recent Average(B)	A - B	Short-term target = $\frac{1}{2}(A-B)+B$
LETE	577	346	231	462
COTE	533	51	482	292
GUTE	40	2	38	21
BLSK	244	20	224	132